

KAREN INFANTE ALLEN
 TRUMBULL CO CLERK OF COURTS
 2022 CV 00387
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MDH/sjf
 3/29/2022

IN THE COURT OF COMMON PLEAS
 TRUMBULL COUNTY, OHIO

Anthony Morgan
 676 Maple Street S.W.
 Warren, OH 44485

Plaintiff

v.

XPO Logistics, Inc.
 Five American Lane
 Greenwich, CT 06831

and

Mario P. Mauro
 8625 Van Buren Street
 Merrillville, IN 46410-8511

Defendants

) CASE NO.:

) JUDGE:

) COMPLAINT

) (OTHER TORTS)

FIRST CLAIM

1. On the 8th day of April 2021, Plaintiff, Anthony Morgan, was proceeding west on South Street, in the City of Warren, County of Trumbull, State of Ohio.
2. At that time, Defendant, Mario P. Mauro, negligently operated his motor vehicle into the motor vehicle driven by Plaintiff, Anthony Morgan, causing the damages hereinafter described.
3. At the time of the above-described accident, XPO Logistics, Inc., negligently entrusted their motor vehicle to Defendant, Mario P. Mauro. Further, Mario P. Mauro was the employee or agent of XPO Logistics, Inc. acting within the scope of his employment or agency.

EXHIBIT A

4. As a result of the negligence of the Defendants, Mario P. Mauro and XPO Logistics, Inc., Plaintiff, Anthony Morgan, suffered injuries to his head, neck, back and other parts of his body causing pain and permanent damage.

5. Plaintiff, Anthony Morgan, has incurred medical expenses, hospital expenses, and other expenses, and will incur further such expenses.

6. Plaintiff, Anthony Morgan, has sustained permanent damage, pain and suffering, and expects to incur further pain and suffering in the future.

7. Plaintiff, Anthony Morgan, has lost earnings, expects to lose further earnings, and their earning capacity has been permanently impaired.

WHEREFORE, Plaintiff, Anthony Morgan, demands judgment against Defendants, Mario P. Mauro and XPO Logistics, Inc., as follows:

A. Compensatory Damages in an amount in excess of TWENTY-FIVE THOUSAND DOLLARS, (\$25,000.00), for Plaintiff, Anthony Morgan, plus interest at the legal rate of interest from the date of the accident described above;

B. The costs of this Action.

Respectfully submitted,

GERVELIS & HARLAN LLC

/s/ Michael D. Harlan
BY: Michael D. Harlan (#0069160)
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INSTRUCTIONS TO THE CLERK

Please make certified mail service upon the Defendants at the addresses listed in the caption above.

/s/ Michael D. Harlan
BY: Michael D. Harlan (#0069160)
Attorney for Plaintiff